

EXHIBIT A

Individual	One of 38 Custodians?	Identified in Plaintiff's Initial Disclosures?	Identified in Plaintiff's Document Requests?
Chae An			Yes
Daniel Bingham	Yes	Yes	Yes
Adam Bird			
Thomas Bohn			
Steven Cohen	Yes	Yes	Yes
Frank Cummings		Yes	
Sarah Diamond	Yes	Yes	Yes
Dominque Dubois			
Mark Foster	Yes	Yes	Yes
William "Bill" Fuessler	Yes	Yes	Yes
Daniel Gotlieb	Yes	Yes	Yes
Gerald Hayden	Yes	Yes	Yes
Peter Korsten	Yes		Yes
Jürgen Lang			
Anthony Lipp	Yes	Yes	Yes
Jesus Mantas			Yes
Anthony Marshall	Yes		Yes
Pablo Padin	Yes		Yes
Shanker Ramamurthy	Yes	Yes	Yes
Alfredo Munoz Rios			
Pablo Suarez	Yes	Yes	Yes
John Thompson			
David Trinh	Yes	Yes	Yes

- Adam Bird and Dominique Dubois – Plaintiff makes non-specific allegations about IBM’s Intelligent Workflows as allegedly incorporating his trade secrets. *See D.I. 145-1.* Mr. Bird and Ms. Dubois participated in aspects of the development of Intelligent Workflows, and documents from each have been produced. Additionally, Ms. Dubois’s name appears in documents that IBM produced as early as December 1, 2022. Mark Foster, IBM Consulting’s retired Chairman, who has been among Plaintiff’s 38 custodians since early in the case, will provide testimony regarding Intelligent Workflows. Mr. Bird and Ms. Dubois were identified because Plaintiff has failed to narrow or specify his claim, even in his latest supplemental interrogatory responses.
- Thomas Bohn and Jürgen Lang – Mr. Bohn and Mr. Lang worked with former IBM employee Thomas Hager. Mr. Hager was identified in Plaintiff’s March 20, 2023 Discovery Demands, but Mr. Hager left IBM in October 2021. Accordingly, defendants sought information from Mr. Bohn and Mr. Lang. Their names appear in documents that IBM produced as early as December 1, 2022. They are not “new” to Plaintiff.
- Alfredo Munoz Rios – He is the author of at least two of the IBM documents that Plaintiff accuses of incorporating his alleged trade secrets – first identified in Plaintiff’s

June 27, 2023 supplemental interrogatory responses, though the two documents were each produced to Plaintiff on December 1, 2022. He is not “new” to Plaintiff.

- John Thompson – Plaintiff makes vague allegations against a number of IBM’s software products. Plaintiff never worked for IBM’s software division. Mr. Thompson is a long-time IBM employee with knowledge of the history of IBM’s software division, and because Plaintiff’s allegations remain vague and non-specific, IBM identified an individual who can hopefully respond to any tardy specific allegation.